REMARKS

The present application has been reviewed in light of the Office Action dated December 18, 2002. Claims 1-3, 5-12, 14-20, 22-29, 31-37, 39-46, and 48-57 are presented for examination, of which Claims 1, 10, 18, 27, 35, and 44 are in independent form. Claims 4, 13, 21, 30, 38, and 47 have been cancelled, without prejudice or disclaimer of the subject matter presented therein. Claims 1, 3, 6, 7, 9, 10, 12, 15-18, 20, 23, 24, 26, 27, 29, 32-35, 37, 39-41, 43, 44, 46, and 49-51 have been amended to define Applicants' invention more clearly. Favorable reconsideration is requested.

The Office Action states that Claims 1-57 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,032,157 (Tamano et al.) in view of U.S. Patent No. 6,175,829 (Li et al.). Cancellation of Claims 4, 13, 21, 30, 38, and 47 renders their rejections moot. Applicants respectfully traverse the rejections and submit that independent Claims 1, 10, 18, 27, 35, and 44, together with the claims dependent thereon, are patentably distinct from the cited prior art for at least the following reasons.

The aspect of the present invention set forth in Claim 1 is directed to an image managing apparatus for managing retrievable images. The apparatus includes input means and memory means. The input means inputs relevant information concerning a plurality of objects in a single image. The relevant information includes an appearance quality of each of the plurality of objects in the single image and a word describing an appearance relationship between two or more objects in the single image. The memory means stores the inputted relevant information in association with each of the plurality of objects in the single image, respectively.

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Tamano et al., as understood by Applicants, relates to a retrieval system in which two different and separate images are linked. Tamano et al. teaches that, when an image showing buildings (first image) and a map image showing roads (second image) are displayed, a user can point to a building on the first image to retrieve stored attribute information (a road location of the building) linking the first and second images. (See column 4, line 26, through column 5, line 6.) Thus, Tamano et al. is understood to provide a system for retrieving information regarding an object, in which the retrieved information is relevant to (i.e., links) two unrelated images.

In the Office Action, it is conceded that Tamano et al. "does not teach explicitly inputting relevant information for an image object." The Office Action then alleges that Li et al. remedies the deficiencies of Tamano et al.

Li et al., as understood by Applicants, relates to a system for providing feedback information to a user regarding a search (query) requested by the user. The system apparently uses semantics (words) to perform the search, and provides statistics to the user regarding matches found in the search.

Applicants submit that a combination of Tamano et al. and Li et al., assuming such combination would even be permissible, would fail to teach or suggest an image managing apparatus for managing retrievable images, wherein the apparatus includes "input means for inputting relevant information concerning a plurality of objects in a single image, the relevant information including an appearance quality of each of the plurality of objects in the single image and a word describing an appearance relationship between two or more objects in the single

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image," and "memory means for storing the relevant information inputted by said input means in

association with each of the plurality of objects in the single image, respectively," as recited in

Claim 1.

Li et al., in column 10, apparently discloses that the system searches for object

types, such as "human" and "vehicle," and lists statistics (e.g., a degree of relevance) on search

results that contain all of the object types. In the example presented in Li et al., the search results

include: a man and a bus; a woman and a car; a woman and a bus.

Li et al. does not, however, teach or suggest utilizing a word describing an

appearance relationship between the object types, such as how the human appears in relation to

the vehicle. That is, nothing has been found in Li et al. that would suggest to one of ordinary

skill in the relevant art to retrieve information according a description of how two or more

objects in a *single* image appear in relation to each other.

Accordingly, Applicants submit that Claim 1 is patentable over the cited art,

and respectfully request withdrawal of the rejection under 35 U.S.C. § 103(a). Independent

Claims 10, 18, 27, 35, and 44 include a feature similar to that discussed above, in which

information is retrieved according a description of how two or more objects in a single image

appear in relation to each other. Therefore, those claims also are believed to be patentable for at

least the same reasons as discussed above.

The other rejected claims in this application depend from one or another of the

independent claims discussed above and, therefore, are submitted to be patentable for at least the

same reasons. Since each dependent claim is also deemed to define an additional aspect of the
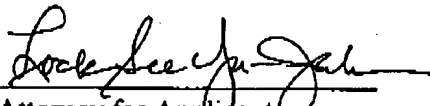
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invention, individual reconsideration of the patentability of each claim on its own merits is respectfully requested.

The present Amendment After Final Action is believed clearly to place this application in condition for allowance and, therefore, its entry is believed proper under 37 C.F.R. § 1.116. Accordingly, entry of this Amendment, as an earnest effort to advance prosecution and reduce the number of issues, is respectfully requested. Should the Examiner believe that issues remain outstanding, it is respectfully requested that the Examiner contact Applicants' undersigned attorney in an effort to resolve such issues and advance the case to issue.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

Applicants' undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

Attorney for Applicants
Lock See Yu-Jahnes
Registration No. 38,667

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200

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